

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
(SAN FRANCISCO DIVISION)

IN RE: VIAGRA (SILDENAFIL CITRATE)  
PRODUCT LIABILITY LITIGATION

Case No.: 3:16-md-02691-RS  
MDL No. 2691

Case No:

Bernard McDermott  
Plaintiff(s)

**Master Short Form Complaint**

v.

*Pfizer Inc.*  
Defendant

Plaintiff(s), Bernard McDermott, incorporates by reference the Plaintiffs' Master Long Form Complaint filed with United States District Court for the Northern District of California in the matter of *In re: Viagra (Sildenafil Citrate) Products Liability Litigation*. Plaintiffs further show the court as follows:

1. Plaintiff's Name:

a. Bernard McDermott

2. Name of the party or deceased who ingested Viagra or Revatio (hereinafter, "Viagra"), and suffered injury, if different than Plaintiff:

a. N/A

3. Name of additional or other Plaintiff, including loss of consortium plaintiffs (i.e. administrator, executor, guardian, conservator):

a. N/A

4. Plaintiff's current city and state of residence:

a. Hobe Sound, FL

5. District Court in which venue would be proper absent direct filing:

a. Southern District of FL

6. City and state of Plaintiff or decedent when they were diagnosed with melanoma:

a. Hobe Sound, FL

7. Approximate dates that the Plaintiff or decedent ingested Viagra:

a. Start date: 2004

b. Stop date: approx, 2014

8. Date(s) that Plaintiff was diagnosed with melanoma which he alleges was caused by Viagra:

a. July 30, 2014

9. Date of death of decedent, if applicable:

a. N/A

10. Defendants against whom Complaint is made:

a. Pfizer Inc.: X

b. Other: \_\_\_\_\_

11. Counts in the Master Complaint brought by Plaintiff(s):

a. Count 1 (Negligence): X

b. Count 2 (Gross Negligence): X

c. Count 3(Negligence Per Se): X

d. Count 4 (Unfair and Deceptive Trade Practices: Unfairness) X

e. Count 5 (Unfair and Deceptive Trade Practices: Fraud) X

f. Count 6 (Unfair and Deceptive Trade Practices: Unlawfulness) X

g. Count 7 (Strict Liability – Defective Design): X

h. Count 8 (Strict Liability – Failure to Warn): X

i. Count 9 (Failure to Test): X

- j. Count 10 (Breach of Express Warranty):   X
- k. Count 11 (Breach of Implied Warranty):   X
- l. Count 12 (Fraudulent Misrepresentation and Concealment):   X
- m. Count 13 (Negligent Misrepresentation and Concealment):   X
- n. Count 14 (Fraud and Deceit):   X
- o. Count 15 (Willful, Wanton, and Malicious Conduct):   X
- p. Count 16 (Unjust Enrichment):   X
- q. Count 17 (Loss of Consortium):
- r. Count 18 (Survival):
- s. Count 19 (Wrongful Death):
- t. Count 20 (Punitive Damages):   X
- u. Other:   Discovery Rule and Equitable Tolling/Estoppel

12. Jury Demand

- a. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff(s) hereby demand a trial by jury as to all claims in this action: Yes   X   No

Dated this the   30th   day of   July  , 20  18  .

Respectfully submitted on behalf of the Plaintiff(s),

  s/Amanda M. Williams  

**Amanda M. Williams**

**GUSTAFSON GLUEK PLLC**

Amanda M. Williams

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